

## **DOCUMENT REQUESTS**

Identify and produce the following in Your possession, custody, or control:

1. All Documents and Communications relating to Your employment at Meta, Including complaints You filed with Meta while employed and documents relating to any work You conducted during Your employment: to the extent the Documents and Communications relate to (1) the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and alleged harms created by the use of Social Media Platforms, (2) any complaints You filed with Meta, and (3) the circumstances of Your departure from Meta.

2. All Documents and Communications between You and current and/or former Meta employees concerning Social Media Platforms and the mental, social, emotional, or behavioral health of, safety of, or the sexual exploitation of persons under the age of 18, Including Arturo Bejar, Vaishnavi Jayakumar (aka “Vaishnavi J”), Kang-Xing Jin (aka “KX Jin” or “Robert Jin”), Margaret Gould Stewart, Samir Patel, and/or Alison Lee, excluding Communications sent by You from Your Meta email address.

3. All Documents and Communications relating to Your possession of Meta Documents following the conclusion of Your work at Meta, Including all statements, press releases, or talking points prepared in relation to: (a) public statements You made regarding these Documents; and (b) meetings You had with government regulators regarding these Documents, Including such meetings that were not open to the public: to the extent the Documents and Communications relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and alleged harms created by the use of Social Media Platforms.

4. All Documents in Your possession that You obtained from Meta’s systems and repositories or documents from Meta’s systems and repositories that You obtained through other means. [Resolved, pending confirmation from Ms. Haugen’s counsel.]

5. Your Meta-issued laptop and any other devices or equipment issued to you in connection with your employment at Meta. [Resolved, pending confirmation from Ms. Haugen’s counsel.]

6. All Documents and Communications concerning any written or oral testimony before any government body, Including Communications about providing or preparing such testimony and interviews regarding such testimony, Including: (i) Your October 2021 written and oral testimonies before the United States Senate Committee on Commerce, Science, & Transportation and its Subcommittees; and (ii) Your December 2021 written and oral testimonies before the United States House of Representatives

Committee on Energy and Commerce Subcommittee on Communications and Technology; to the extent the Documents and Communications relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and alleged harms created by the use of Social Media Platforms.

7. All Documents and Communications with or relating to Your meetings with United States Congress members and staffers insofar as the Documents and Communications also relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18.

8. All Documents and Communications related to Your interview with CBS's 60 Minutes, Including: (i) Your preparation for this interview with Bryson Gillette in or about August, September, and October 2021; and (ii) Your August 2021 video call with Jeff Horwitz and CBS; to the extent the Documents and Communications relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and alleged harms created by the use of Social Media Platforms.

9. All Documents and Communications between You and Bill Burton and Emily Schwartz and their agents regarding any public statements You have made concerning the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and alleged harms created by the use of Social Media Platforms, Including: (i) Your interview with CBS's 60 Minutes; and (ii) Your interview with the Center for Human Technology podcast.

10. All Documents and Communications with regulators and law enforcement, which Includes: the offices of various State Attorneys General, Including the offices in California, Massachusetts, Vermont, Nebraska, New Mexico, Nevada, Ohio, Tennessee, D.C., and Puerto Rico related to Social Media Platforms, except to the extent the Documents and Communications are responsive to Request No. 20.

11. All Documents and Communications between You and any lobbying firms concerning the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and alleged harms created by the use of Social Media Platforms, Including: the lobbying firm Reset (or "Reset Tech"); its founder, Ben Scott; and its agents.

12. All Documents and Communications between You and any reporter, journalist, and editor associated with any periodical, blog, podcast, or other media platform, Including All Communications with Jeff Horwitz of the Wall Street Journal,

concerning the use of Social Media Platforms by, safety of, or the sexual exploitation of persons under the age of 18.

13. All Documents and Communications related to the research, development, and publication of “The Facebook Files: A Wall Street Journal Investigation” (hereinafter “the Facebook Files”).

14. All Documents and Communications between and regarding You and Pierre Omidyar, Including the Omidyar Network, the Luminate Group, the Democracy Fund, as well as other non-profit or other advocacy groups controlled by or affiliated with Mr. Omidyar relating to Your role in the Facebook Files, or concerning the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18.

15. All Documents and Communications related to payment for, or reimbursement of expenses for, statements or appearances made by You concerning Social Media Platforms.

16. All Documents and Communications concerning research or analyses related to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under 18.

17. All Documents and Communications between You and: Common Sense Media and James Steyer; McCourt Institute and Frank McCourt; Sustainable Media Center and its Entertainment/Media/Advertising/Technology Advisory Board; Center for Humane Technology; Integrity Institute and Sahar Massachi, Matt Motyl, Jeff Allen, and Sofia Bonilla; and Council for Responsible Social Media, or persons acting on behalf of these persons or entities, insofar as the Documents and Communications also relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18.

18. All Documents and Communications related to the research, development, and publication of *The Power of One: Blowing the Whistle on Facebook* insofar as the Documents and Communications also relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18.

19. All Documents and Communications related to the development of “Beyond the Screen,” and Documents and Communications between You and any agents or employees of Beyond the Screen, insofar as the Documents and Communications also relate to the use of Social Media Platforms by, the safety of, or the sexual exploitation of persons under the age of 18.

20. All Documents and Communications with parties, lawyers, and any individuals working on their behalf that are engaged in litigation against Social Media Platforms, Including Communications with: Social Media Victims Law Center; Motley Rice, LLP; Seeger Weiss, LLP; Lieff Cabraser Heimann & Bernstein, LLP; Morgan & Morgan; and Bernstein Litowitz Berger & Grossmann LLP. [\[Withdrawn.\]](#)

21. All Documents and Communications with Whistleblower Aid, John Tye, and Andrew Bakaj, including anyone acting on behalf of these individuals, regarding Meta. [\[Withdrawn.\]](#)

22. Documents sufficient to understand Your educational background, professional training, and any areas of Your professed expertise. [\[Resolved.\]](#)

23. Your most current resume, and the resume you submitted when you applied to work at Meta. [\[Resolved.\]](#)

<b>Summary report:</b>	
<b>Litera Compare for Word 11.10.1.2 Document comparison done on</b>	
<b>7/15/2025 8:59:11 PM</b>	
<b>Style name:</b> Comments+Color Legislative Moves+Images	
<b>Intelligent Table Comparison:</b> Active	
<b>Original DMS:</b> iw://dmsweb.ad.dpw.com/AMERICASACTIVE/100675614/1	
<b>Modified DMS:</b> iw://dmsweb.ad.dpw.com/AMERICASACTIVE/100675614/3	
<b>Changes:</b>	
<u>Add</u>	12
<del>Delete</del>	5
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<del>Table Delete</del>	0
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	17